

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

| | | |
|----------------------------------|---|-----------------------------|
| MICHAEL H. RYU, |) | |
| |) | |
| Plaintiff, |) | |
| v. |) | C.A. #1:15-cv-202 (CMH/JFA) |
| |) | |
| WANDA F. BRYANT, <i>et al.</i> , |) | |
| |) | |
| Defendant. |) | |

PROPOSED DISCOVERY PLAN

The parties jointly submit the following proposed discovery plan:

1. Disclosures will be made by September 25, 2015.
2. Discovery will address the claims and defenses in the case, and be completed in accordance with the scheduling order in this case, by December 11, 2015. No phasing is necessary.
3. Electronically stored information will be produced electronically.
4. Counsel will remit a privilege log identifying discovery not made by reason of privilege. Communications to and from litigation counsel need not be included in this log.
5. Any expert witnesses shall be identified as follows:
 - * By plaintiff, by September 30, 2015,
 - * By defendant, by October 30, 2015,
 - * Rebuttal by plaintiff, by November 13, 2015.
5. Counsel are currently unaware of any need to diverge from the usual limitations on discovery, but reserve the right to request additional discovery for cause. Counsel foresee no particular discovery-related issues arising in this case that they should not be able to resolve between themselves, having recourse to the court only if necessary.

/s/

Julia B. Judkins
Virginia State Bar No. 22597
Heather K. Bardot
Virginia State Bar No. 37269
Bancroft, McGavin, Horvath & Judkins, P.C.
3920 University Drive
Fairfax, Virginia 22030
(703) 385-1000 (telephone)
(703) 385-1555 (facsimile)
Jjudkins@bmhjlaw.com
Counsel for Defendants

/s/

Victor M. Glasberg, VSB# 16184
Victor M. Glasberg & Associates
121 S. Columbus Street
Alexandria, VA 22314
(703) 684-1000 (telephone)
(703) 684-1104 (facsimile)
vmg@robinhoodsq.com
Counsel for Plaintiff